

U.S. Pat. App. No.: 10/705,718
Atty. Docket No.: 003797.00711

respectfully traverse this rejection, and ask for its reconsideration. In particular, Applicants courteously submit that the Primary Examiner's basis for making this rejection is clearly erroneous.

For example, in making this rejection, the Primary Examiner stated that "...[a] tool for associating characters non-statutory [sic] is not qualified for useful [sic] process and machine." (See Office Action, page 2, lines 8-9.) Applicants point out that the specification explains, *in detail*, how the claimed tool for associating characters is useful for improving the conversion of a first set of characters to a second set of characters.

The Primary Examiner further argued that "[t]he tool is not apparatus [sic], is it is a program per se. It is not embodied tangibly throughout [sic] it has a tangible result. It is not in itself tangible." (*Id.*, lines 9-10.) Applicants courteously point out that the Primary Examiner has no basis for making this assertion. The specification teaches that a tool for associating characters may be implemented by a programmable computer. (See, e.g., paragraph 31.) A computer is clearly a tangible item.

Moreover, the Primary Examiner's arguments ignore method claims 21-25 entirely, making the rejection of these claims improper on its face. Applicants respectfully submit that each of the pending claims recites a method or apparatus that produces a useful, tangible result and thus recite statutory subject matter as set forth in the "Interim Guidelines For Examination Of Patent Applications For Patent Subject Matter Eligibility" which the U.S. Patent and Trademark Office published on October 26, 2005. It is therefore again urged that each of claims 1-25 is patentable under 35 U.S.C. §101, and

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Applicants therefore ask that the rejection of these claims under 35 U.S.C. §101 be withdrawn.

Next, claims 1-25 were rejected under 35 U.S.C. §103 over U.S. Patent No. 4,980,840 to Yin in view of U.S. Patent No. 5,526,259 to Kaji et al. Applicants respectfully traverse this rejection, and courteously ask for its reconsideration.

First, Applicants submit that the Primary Examiner has not set forth the *prima facie* showing of obviousness necessary to sustain this rejection. More particularly, the Primary Examiner has not provided sufficient motivation to support the combination of the Yin and Kaji et al. patents. In making this rejection, the Primary Examiner stated only that

It would have been obvious to one of an ordinary skill in the art at the time the invention was made to provide a user interface that allows a user to designate the segmentation of characters by the segmentation module as taught by Kaji to a word segmentation method to identify proper names of Yin in order to provide a word segmentation refers [sic] to the process of identifying individual words that conversion [sic] an expression of language. (See Office Action, page 3, lines 11-16.)

Applicants respectfully point out that this statement appears to have no syntactical meaning, and certainly does not explain why one of ordinary skill in the art would have been lead to combine the teachings of the Yin and Kaji et al. patents in the manner asserted by the Examiner.

Second, Applicants respectfully submit that no combination of the Yin and Kaji et al. patents could teach or suggest the features of the invention recited in claims 1-25. Each of claims 1-20 recites a user interface that allows a user to designate the segmentation of characters. As expressly acknowledged by the Primary Examiner, the Yin patent does not teach or suggest this feature of the invention. (See the Office Action, page 3, lines 7-9.) The Kaji et al. patent does not remedy this omission of the Yin patent. For example, in making this rejection, the Primary

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Examiner referred to column 9, lines 10-40 of the Kaji et al. patent. Applicants respectfully point out that this portion of the Kaji et al. patent refers to data records that contain a phonem segment or word segment. These data records are internal to the operation of the Kaji et al. system. Nothing in the Kaji et al. patent would teach or suggest revealing these data records to a user in a user interface, much less allowing a user to designate the segmentation of phonemes or words through a user interface as expressly recited in claims 1-20.

Claims 21-25 then recite providing an indicator that associates a first group of the plurality of characters into a segment, and receiving input modifying the indicator to associate a second group of the plurality of characters into the segment. In rejecting these claims, the Primary Examiner states only that this feature reads upon the portion of the Yin patent at column 8, lines 8-62. The Primary Examiner makes no mention of the applicability of the Kaji et al. patent to the rejection of this claim. Moreover, the portion of the Kaji et al. patent appears completely silent as to an indicator that associates a first group of characters into a segment, and certainly does not teach or suggest receiving input modifying an indicator to associate a second group of characters into a segment. Instead, this portion of the Kaji et al. patent would appear to disclose only a "current position indicator for source text for indicating the processing position in the source text..." (See, e.g., column 8, lines 24-25.) Nothing in this portion of the Kaji et al. patent relates this indicator to the segmentation of either a phoneme or a word.

In summary, it is believed that the Primary Examiner has not established the *prima facie* showing of obviousness required to sustain the outstanding rejection under 35 U.S.C. §103. Moreover, no combination of the Yin and Kaji et al. patents would teach or suggest the features

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of the invention recited in any of claims 1-25. Applicants therefore request that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

It is believed that no fees are due for the entry and consideration of this Amendment. If, however, the Commissioner believes that fees are required, the Commissioner is hereby authorized to charge any fees deemed necessary to maintain the pendency of this application, including any fees under 35 U.S.C. §1.16 and §1.17, to the deposit account of the undersigned, Deposit Account No. 19-0733.

In view of the above remarks, Applicants respectfully submit that all of the claims are allowable, and that this application is therefore in condition for allowance. Applicants courteously ask for favorable action at the Examiner's earliest convenience.

Respectfully submitted,

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